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*Lateral Credit Opportunities, LLC,*

*Lateral Investment Management, LLC,*

*Lateral Fte Feeder, LLC, and*

*Lateral Juscom Feeder, LLC*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

INNOVATIV MEDIA GROUP, INC., a

Wyoming corporation; TTP8, LLC, a

Delaware limited liability company,

Plaintiffs,

vs.

MICHAEL BEYS; RICHARD DE SILVA;

LATERAL U.S. OPPORTUNITIES FUND AI,

L.P., a Delaware Limited Partnership;

LATERAL U.S. CREDIT OPPORTUNITIES

FUND QP, L.P., a Delaware Limited

Partnership; LATERAL CREDIT

OPPORTUNITIES, LLC, a Delaware limited

liability company; LATERAL INVESTMENT

MANAGEMENT, LLC, a Delaware limited

liability company; LATERAL FTE FEEDER,

LLC, a Delaware limited liability company;

LATERAL JUSCOM FEEDER, LLC, a

Delaware limited liability company; DOES I-

X; ROE Entities, I-X,

Defendants.

- and -

FTE NETWORKS INC., nominal party.

**Case No. 2:22-cv-01184-JCM-EJY**

**STIPULATION AND ORDER FOR  
EXTENSION OF TIME TO FILE  
RESPONSE TO PLAINTIFFS'  
VERIFIED COMPLAINT**

**(Second Request)**

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Rules 6-1 and 6-2, Plaintiffs Innovativ Media Group, INC. and TTP8, LLC and Defendants Lateral U.S. Credit Opportunities Fund QP, L.P., Lateral Credit Opportunities, LLC, Lateral Investment Management, LLC, Lateral Fte Feeder, LLC, and Lateral Juscom Feeder, LLC (collectively the “Lateral Companies”) stipulate through their undersigned counsel that the Lateral Companies’ deadline to file a response to Plaintiffs’ Verified Complaint be extended from August 31, 2022 to September 14, 2022. Plaintiffs consent to the extension. It is further agreed that nothing in this stipulation shall be deemed to waive or prejudice any claims or defenses of any party to this action.

The extension is requested because Plaintiff filed another Federal Action (see case No.: 2:22-cv-01362), which included an emergency motion for a temporary restraining order. To allow the Lateral Companies sufficient time to potentially resolve the issues in the new matter and to discuss other related issues, the Lateral Companies require an extension for its response to the complaint in this matter. No other defendants have appeared in the case and there will be no prejudice to other parties if this extension is granted.

DATED this 31st day of August, 2022.

**FENNEMORE CRAIG, P.C.**

By: /s/ Therese M. Shanks

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DATED this 31st day of August, 2022.

**LEX DOMUS LAW**

By: /s/ Brandi M. Planet

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*Lateral Juscom Feeder, LLC*

**IT IS SO ORDERED.**

  
UNITED STATES MAGISTRATE JUDGE